

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

TRAVELERS INSURANCE
INDIVIDUALLY AND A/S/O DACON
CORP. AND A/S/O CONDYNE
VENTURES,

Plaintiff,

v.

GENESIS INDEMNITY INSURANCE
AND TIG INSURANCE,

Defendants.

C.A. NO.: 05-11490JLT

**AUTOMATIC DISCLOSURE OF
DEFENDANT, TIG INSURANCE COMPANY**

Defendant, TIG Insurance Company (hereinafter referred to as "TIG"), hereby submits the following disclosure pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and Local Rule 26.1(A) and 26.2(A).

1. All Documents in Accordance With Local Rule 26.2(A)

A. Individuals Likely To Have Discoverable Information

TIG is not aware of any particular individuals knowledgeable or who have discoverable information pertaining to the allegations in plaintiff's complaint. However, TIG hereby refers the individuals identified by the plaintiff, Travelers Property Casualty, and the co-defendant, Genesis Indemnity Insurance, in their Rule 26 disclosures recently filed, or to be filed, with the Court. TIG further states that investigation and discovery remain ongoing and reserves the right to supplement this response.

B. Documents, Data Compilations And Tangible Things

Other than the subject insurance policy, which has already been produced to the plaintiff, TIG is not aware of any other documents relevant to this insurance coverage dispute beyond what the plaintiff has identified, or will identify, as part of its Rule 26 disclosure.

C. Computation of Damages, Documents Related To Damages

Not applicable to TIG.

D. Insurance Agreements

Not applicable.

2. Sworn Statements In Accordance With Local Rule 26.1(B)

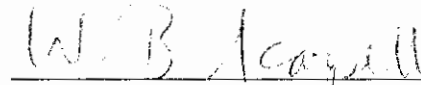
None.

3. List Of Persons We Wish To Depose

None known at the present time. However, as investigation and discovery remain ongoing TIG reserves the right to supplement this response.

The Defendant,

By its Attorneys,



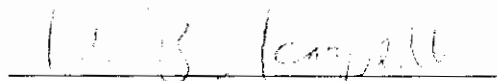
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CERTIFICATE OF SERVICE

I, William B. Scarpelli, hereby certify that a true and accurate copy of the foregoing document was served via first class mail upon the following:

Richard J. Riley, Esquire
Murphy & Riley, P.C.
141 Tremont Street
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Jocelyn M. Sedney, Esquire
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William B. Scarpelli

Dated: September 16, 2005